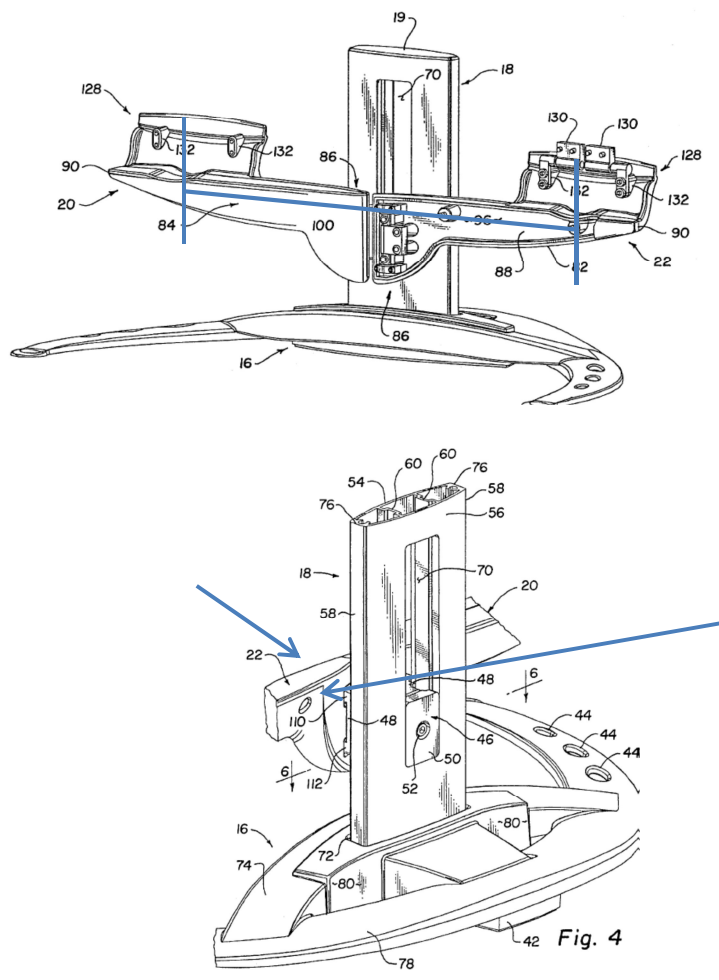
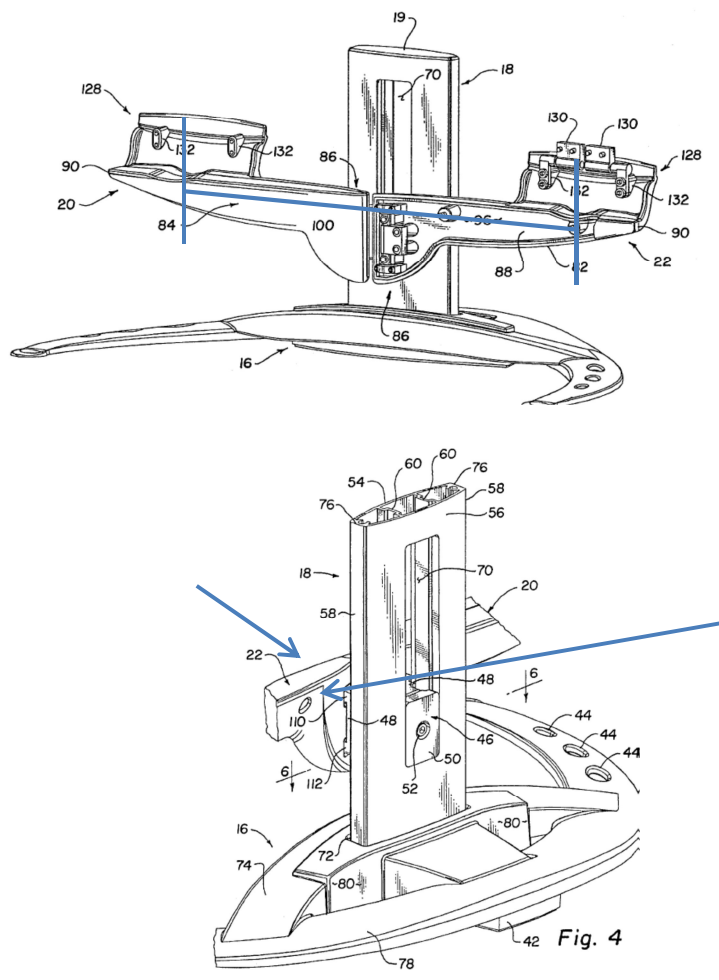
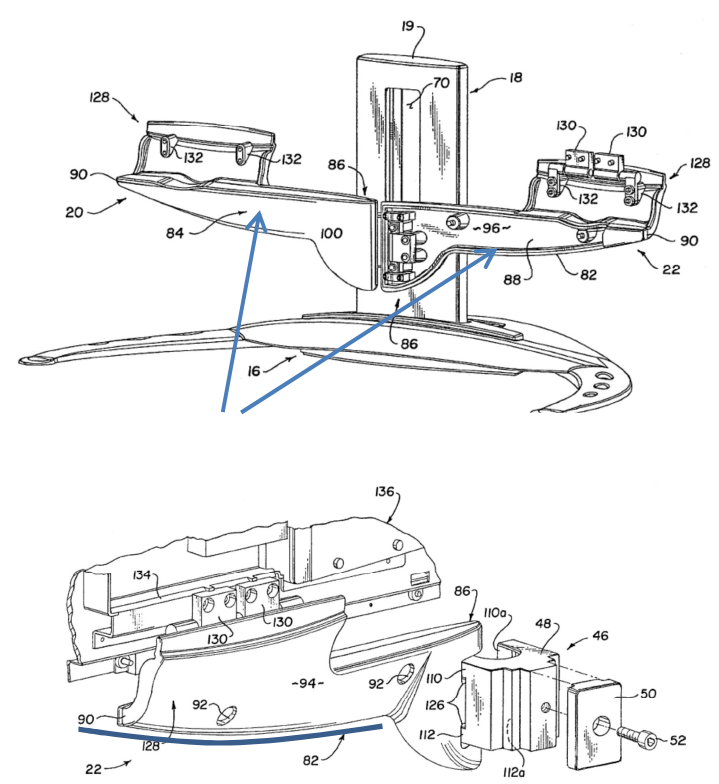
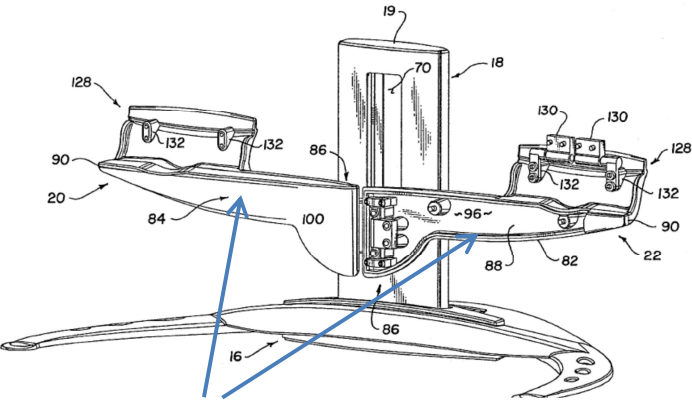


Claim 14	The '328 Patent
<p>The system of claim 9, wherein the support arm is formed as a single piece component.</p>	<p>To the extent Mass's Infringement Contentions are discernible, the feature apparently alleged to be a single piece support arm that extends on either side of the support column is a multi-piece having hinges connecting the different pieces of the support arm. The cantilevered arms 20, 22 of the '328 patent extend on either side of the support column and are connected by hinges. See, for example, hinge portion 104 of pivotable coupling 100 (FIGS. 2 and 3). The cantilevered arms 20, 22 extend on either side of the support column and have a longitudinal length that is longer than the width of the base. To the extent the cantilevered arms 20, 22 of the '328 patent are not a single piece support arm, such a feature would have been obvious to a person of ordinary skill as merely making integral what was previously separate pieces.</p>

Claim 16	The '328 Patent
<p>The system of claim 1, wherein the thickness of the support arm is less than the distance between adjacent connectors.</p>	<p>The thickness of the cantilevered arms 20, 22 in the '328 patent is less than the distance between adjacent connectors.</p> 

Claim 17	The '328 Patent
<p>The system of claim 9, wherein the thickness of the support arm is less than the distance between adjacent connectors.</p>	<p>The thickness of the cantilevered arms 20, 22 in the '328 patent is less than the distance between adjacent connectors.</p> 

Claim 18	The '328 Patent
<p>The system of claim 9,</p> <p>wherein the front of the support arm on one side of the support column has a radius of curvature in the range of 24-36 inches,</p>	<p>The cantilevered arms 20, 22 of the '328 patent (support arm) on one side of the support column has a radius of curvature in the range of 24-36 inches,</p>  <p>The drawing shows a perspective view of a medical device with two cantilevered arms, 20 and 22, extending from a central support column 18. The arms are connected to the column via a joint assembly 86. The arms have a curved front edge 90. The support column has a vertical section 19 and a base 16. The arms are equipped with various components including handles 128, 130, 132, 134, 136, and a control mechanism 46, 48, 50, 52. The drawing also includes a cross-sectional view of the joint assembly 86, showing the internal components 110, 112, 112a, 126, 128, 130, 134, 136, 140, 142, 144, 146, 148, 150, 152, 154, 156, 158, 160, 162, 164, 166, 168, 170, 172, 174, 176, 178, 180, 182, 184, 186, 188, 190, 192, 194, 196, 198, 200, 202, 204, 206, 208, 210, 212, 214, 216, 218, 220, 222, 224, 226, 228, 230, 232, 234, 236, 238, 240, 242, 244, 246, 248, 250, 252, 254, 256, 258, 260, 262, 264, 266, 268, 270, 272, 274, 276, 278, 280, 282, 284, 286, 288, 290, 292, 294, 296, 298, 300, 302, 304, 306, 308, 310, 312, 314, 316, 318, 320, 322, 324, 326, 328, 330, 332, 334, 336, 338, 340, 342, 344, 346, 348, 350, 352, 354, 356, 358, 360, 362, 364, 366, 368, 370, 372, 374, 376, 378, 380, 382, 384, 386, 388, 390, 392, 394, 396, 398, 400, 402, 404, 406, 408, 410, 412, 414, 416, 418, 420, 422, 424, 426, 428, 430, 432, 434, 436, 438, 440, 442, 444, 446, 448, 450, 452, 454, 456, 458, 460, 462, 464, 466, 468, 470, 472, 474, 476, 478, 480, 482, 484, 486, 488, 490, 492, 494, 496, 498, 500, 502, 504, 506, 508, 510, 512, 514, 516, 518, 520, 522, 524, 526, 528, 530, 532, 534, 536, 538, 540, 542, 544, 546, 548, 550, 552, 554, 556, 558, 560, 562, 564, 566, 568, 570, 572, 574, 576, 578, 580, 582, 584, 586, 588, 590, 592, 594, 596, 598, 600, 602, 604, 606, 608, 610, 612, 614, 616, 618, 620, 622, 624, 626, 628, 630, 632, 634, 636, 638, 640, 642, 644, 646, 648, 650, 652, 654, 656, 658, 660, 662, 664, 666, 668, 670, 672, 674, 676, 678, 680, 682, 684, 686, 688, 690, 692, 694, 696, 698, 700, 702, 704, 706, 708, 710, 712, 714, 716, 718, 720, 722, 724, 726, 728, 730, 732, 734, 736, 738, 740, 742, 744, 746, 748, 750, 752, 754, 756, 758, 760, 762, 764, 766, 768, 770, 772, 774, 776, 778, 780, 782, 784, 786, 788, 790, 792, 794, 796, 798, 800, 802, 804, 806, 808, 810, 812, 814, 816, 818, 820, 822, 824, 826, 828, 830, 832, 834, 836, 838, 840, 842, 844, 846, 848, 850, 852, 854, 856, 858, 860, 862, 864, 866, 868, 870, 872, 874, 876, 878, 880, 882, 884, 886, 888, 890, 892, 894, 896, 898, 900, 902, 904, 906, 908, 910, 912, 914, 916, 918, 920, 922, 924, 926, 928, 930, 932, 934, 936, 938, 940, 942, 944, 946, 948, 950, 952, 954, 956, 958, 960, 962, 964, 966, 968, 970, 972, 974, 976, 978, 980, 982, 984, 986, 988, 990, 992, 994, 996, 998, 1000.</p> <p>Fig. 5</p> <p>In addition, configuring the cantilevered arms 20, 22 (support arm) of the '328 patent to have on one side of the support column a radius of curvature in the range of 24-36 inches, would have</p>

	<p>been a mere design choice that would have been obvious according to known methods to yield predictable results. For example, it would have been obvious to modified the cantilevered arms of the '328 patent in view of one or more of one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, the Ergotron Design Station, the '939 patent, and the '017 patent to provide on one side of the support column a radius of curvature in the range of 24-36 inches. In particular, the display panels of the '337 patent are disclosed as being arranged between approximately 18 inches and approximately 24 inches from an eye point of a user. This range overlaps with the claimed range.</p>
<p>and the front of the support arm of the other side of the support column has a radius of curvature in the range of 24-36 inches.</p>	<p>The cantilevered arms 20, 22 of the '328 patent (support arm) on the other side of the support column has a radius of curvature in the range of 24-36 inches,</p> 

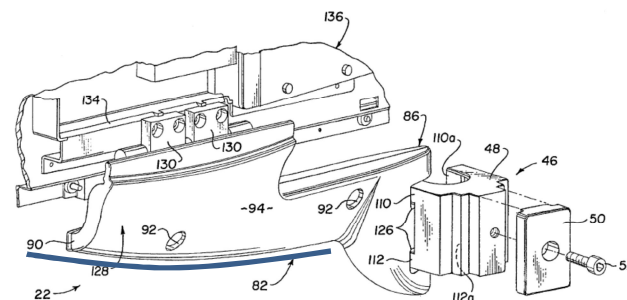
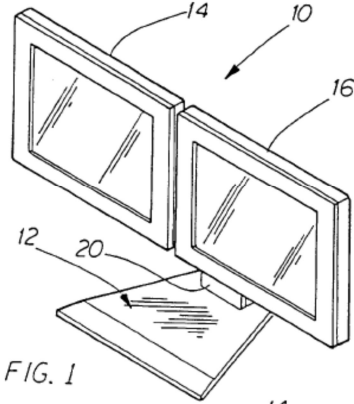
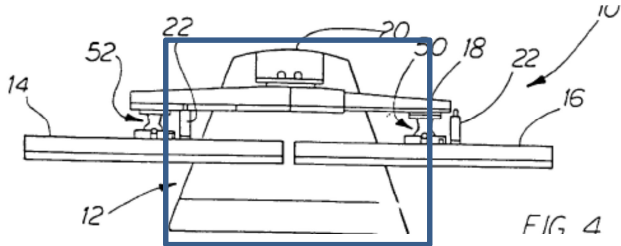


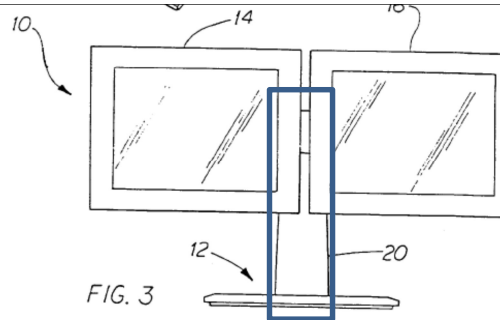
Fig. 5

In addition, configuring the cantilevered arms 20, 22 (support arm) of the '328 patent to have on the other side of the support column a radius of curvature in the range of 24-36 inches, would have been a mere design choice that would have been obvious according to known methods to yield predictable results. For example, it would have been obvious to modified the cantilevered arms of the '328 patent in view of one or more of one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, the Ergotron Design Station, the '939 patent, and the '017 patent to provide on the other side of the support column a radius of curvature in the range of 24-36 inches. In particular, the display panels of the '337 patent are disclosed as being arranged between approximately 18 inches and approximately 24 inches from an eye point of a user. This range overlaps with the claimed range.

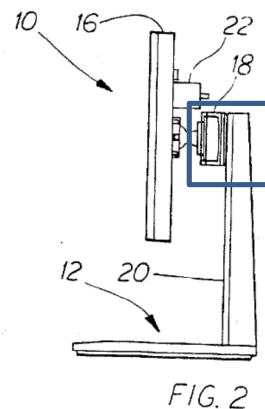
III. US 5,687,939

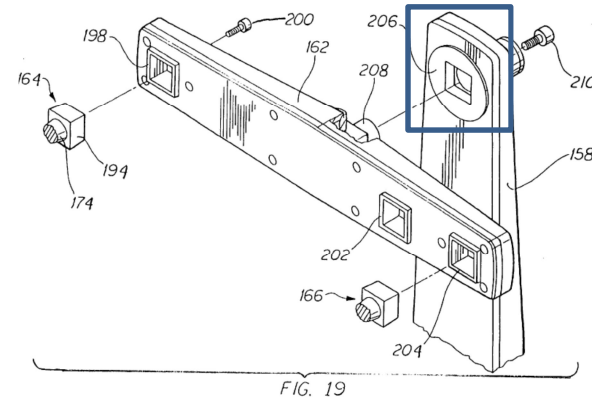
Claim 1	US Patent No. 5,687,939 (hereinafter "the '939 patent")
A display system comprising:	The '939 patent discloses a display system 10. See, for example,

	<p>FIGS. 1–6.</p>  <p>FIG. 1</p>
<p>a base;</p>	<p>The display system 10 has a base 12.</p>  <p>FIG. 4</p>
<p>a support column connected to the base and having a mounting portion extending in a vertical direction away from the base when the base is disposed on a horizontal surface;</p>	<p>The display system 10 in the '939 patent has a support column connected to the base 12. See, for example, hollow upright 20.</p>



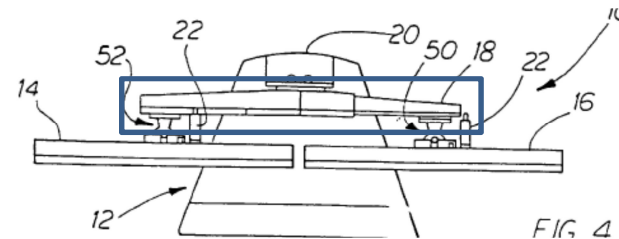
To the extent Mass's Infringement Contentions are discernible, the feature apparently alleged to be a mounting portion is a portion of a support column to which the support arm mounts. The hollow upright 20 in the '939 patent has a portion of a support column to which a support arm mounts. The mounting portion extends in a vertical direction away from the base when the base is disposed on a horizontal surface.





a support arm structure secured to the support column, the support arm structure having a single piece support arm that extends on either side of the support column and that has a longitudinal length that is longer than the width of the base; and

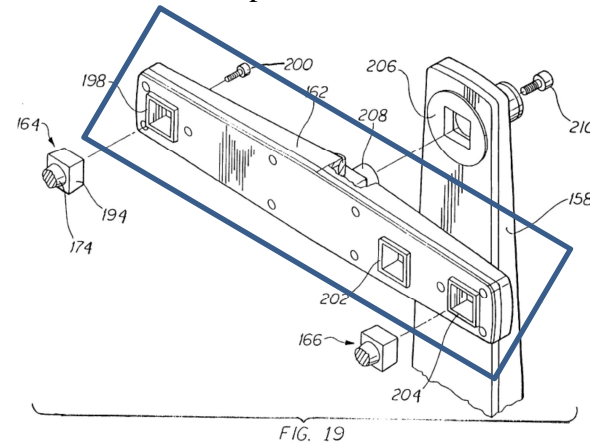
The '939 patent has a support arm structure secured to the support column 20.



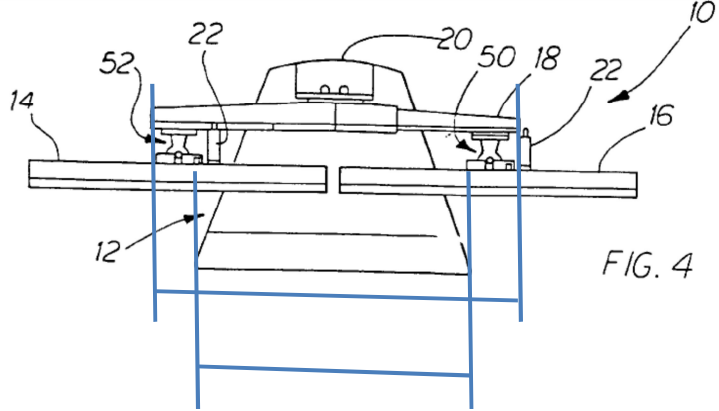
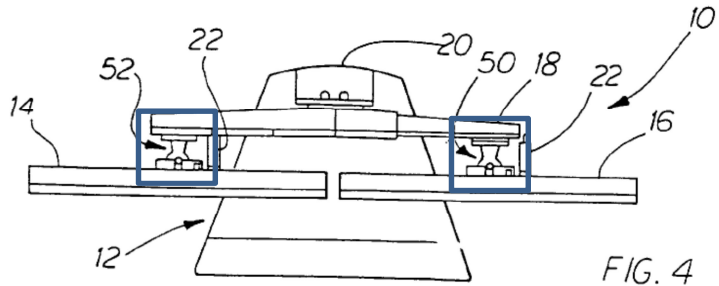
To the extent Mass's Infringement Contentions are discernible, the feature apparently alleged to be a single piece support arm that extends on either side of the support column is a multi-piece arm having an extension (hinges) connecting the different pieces of the support arm. The support arm 18 of the '939 patent has multi-piece arm having an extension connecting the different pieces of the support arm. Thus, the support arm 18 in the '939

patent is a single piece support arm under Mass's construction.

To the extent the support arm 18 of the '939 patent is not a single piece support arm, such a feature would have been obvious to a person of ordinary skill as merely making integral what was previously separate pieces. For example, it would have been obvious to the person of ordinary skill in the art to make the support arm 18 of the '939 patent a single piece in view of support arm 162 also disclosed in the '939 patent, which is a single piece. See, for example, col. 6, ll. 52-64.



Further, the support arm 18 of the '939 patent extends on either side of the support column and that has a longitudinal length that is longer than the width of the base.

	
<p>at least two connectors for connecting display housing portions at the backs of at least two displays to the support arm, such that at least a part of the support column is disposed behind the at least two displays,</p>	<p>The display system 10 in the '939 patent has at least two connectors for connecting display housing portions at the backs of at least two displays to the support arm 18, such that at least a part of the support column is disposed behind the at least two displays. See, for example, mounting structures 50, 52 (col. 3, ll. 54-col. 4, ll. 67; FIGS. 1-5, 9-11).</p> 
<p>wherein: the support arm is a) bowed at the front of the support arm so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays,</p>	<p>It would have been obvious to a person of ordinary skill in the art to have modified the support arm 18 in the '939 patent such that the support arm is bowed at the front of the support arm so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays. Such a modification would</p>

have been a mere design choice that would have been obvious according to known methods to yield predictable results. For example, it would have been obvious to have modified the support arm in the '939 patent in view of one or more of the following secondary references to yield a support arm that is bowed at the front of the support arm so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays:

Secondary References

(1) The '337 patent

The '337 patent relates to a multi-panel video display system having a plurality of displays that are arranged so the display panels are substantially equidistant from an eye point of a user. The patent discloses a display arrangement that is bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays. For example, the display panels are disclosed as being arranged between approximately 18 inches and approximately 24 inches from an eye point of a user. (column 2, lines 30-60).

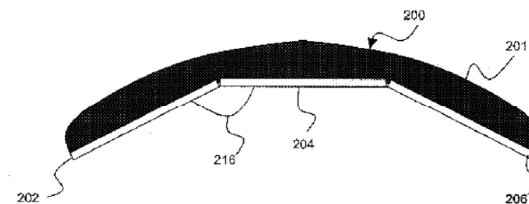


FIG. 3B

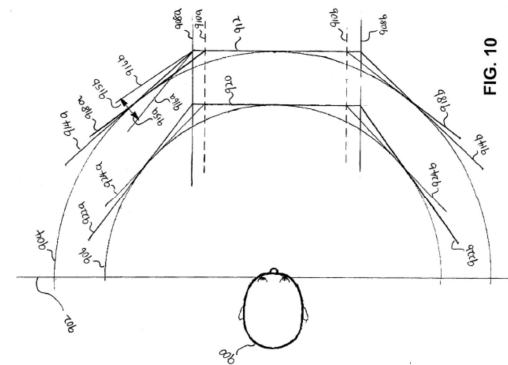
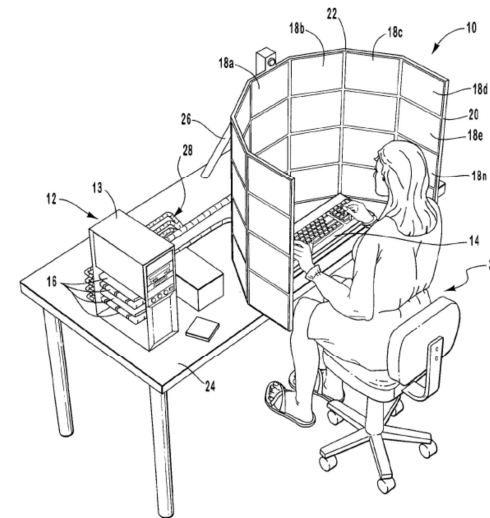


FIG. 10

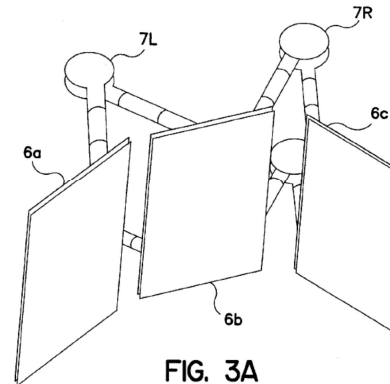
(2) The '328 publication

The '328 publication describes a multi-screen display system that includes a plurality of display screens that are concave in shape about a user. (Abstract). The publication discloses a display arrangement that is bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays.



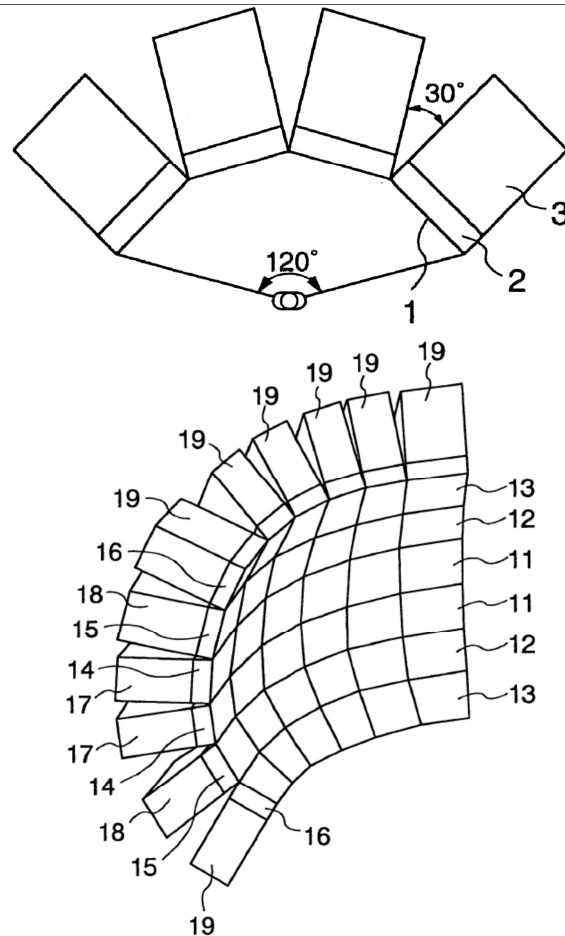
(3) The '890 patent

The '890 patent discloses a two-dimensional image display device that includes a curved display system wrapping about a user. The patent discloses that the display system is bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays.



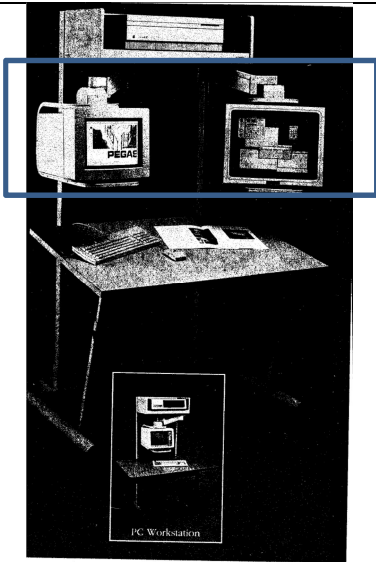
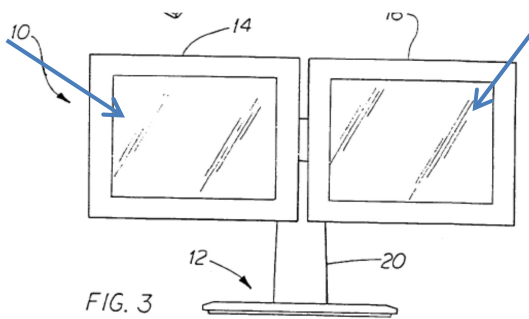
(4) The '153 patent

The '153 patent discloses a multi-display apparatus that arranges display devices across a concave surface both in a horizontal visibility angle direction and a vertical visibility angle direction. The patent discloses that the display devices are bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays.



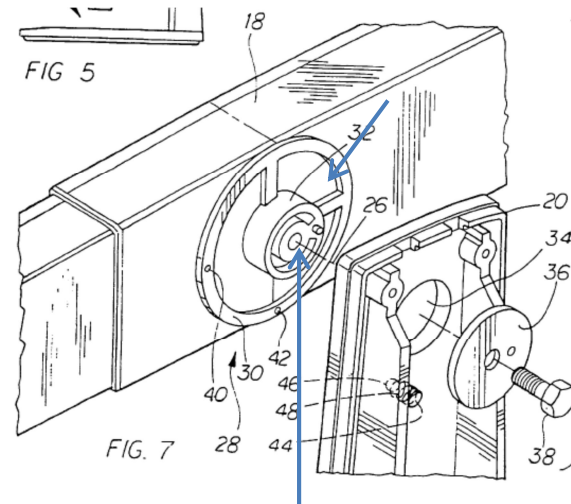
(5) The Ergotron Design Station

The Ergotron Design Station discloses a display system that has a support arm assembly that is bowed at the front of the support arm assembly so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays.

	
<p>b) adapted to support all of the weight of the at least two displays when the display housing portions at the backs of the at least two displays are connected to the support arm, and c) substantially horizontal in use,</p>	<p>The support arm 18 in the '939 patent, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, and the Ergotron Design Station, is adapted to support all of the weight of the at least two displays when the display housing portions at the backs of the at least two displays are connected to the support arm, and substantially horizontal in use.</p>  <p>FIG. 3</p>

the support arm structure further comprising a mounting member with a hole and at least one aperture,

The support arm structure of the '939 patent further includes a mounting member with a hole and at least one aperture.

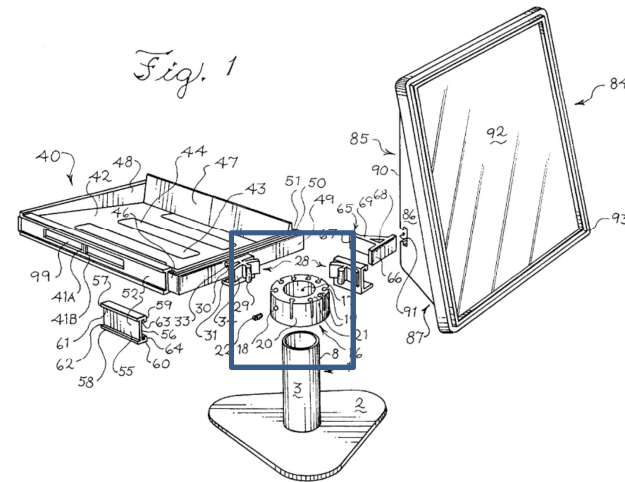


In addition, to the extent Mass's Infringement Contentions are discernible, the feature apparently alleged to be a mounting member with a hole and at least one aperture is a clamp that goes over a pole and has an opening for a tightening screw. To the extent the display system 10 of the '939 patent does not have a support arm structure that includes a mounting member with a hole and at least one aperture, such a feature would have been obvious to a person of ordinary skill in the art. For example, it would have been obvious to have modified the display system 10 of the '939 patent, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, the Ergotron Design Station to include a clamp that goes over a pole (*upright* 20) and an opening for a tightening screw.

Secondary Reference

The '017 patent

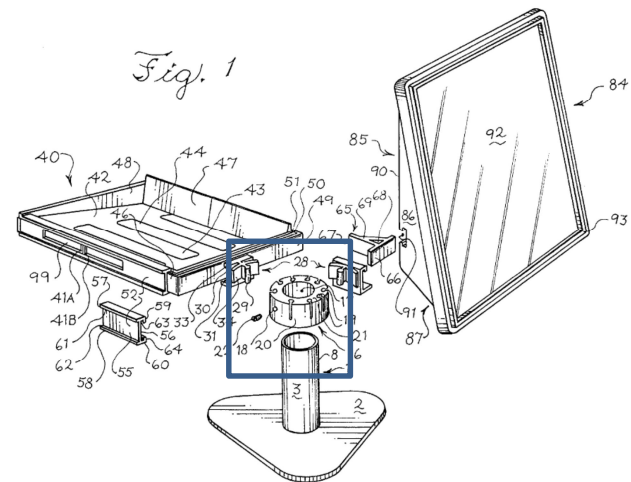
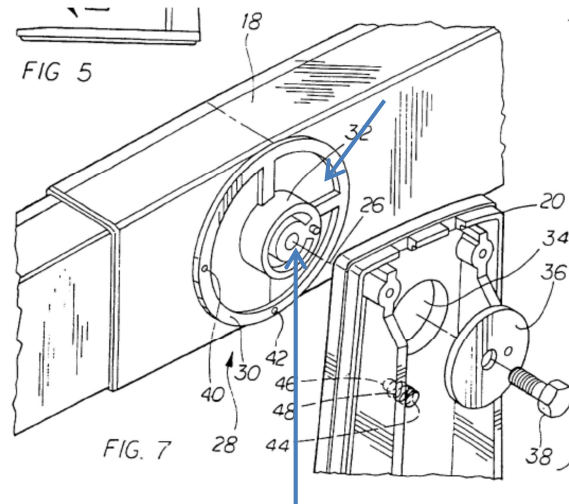
The '017 patent describes a display system having a foundational unit. With respect to FIG. 1, the reference describes the foundational unit 1 comprised of a base 2 and column 3. A supporting collar 16 can slip over the column 3 and is mounted to the column by means of a screw.



such that the support arm structure, and the single piece support arm thereof, is secured to the support column through the mounting member by an acceptance of the mounting portion of the support column into the hole and

The support arm structure of the '939 patent, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, the Ergotron Design Station, and the '017 patent further includes a mounting member with a hole and at least one aperture such that the support arm structure, and single piece support arm thereof, is secured to the support column through the mounting member by an acceptance of the mounting

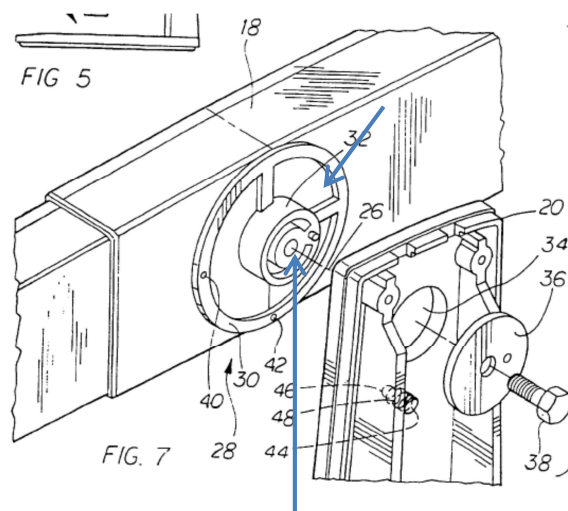
portion of the support column into the hole. For example,

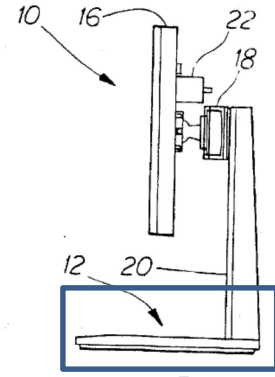


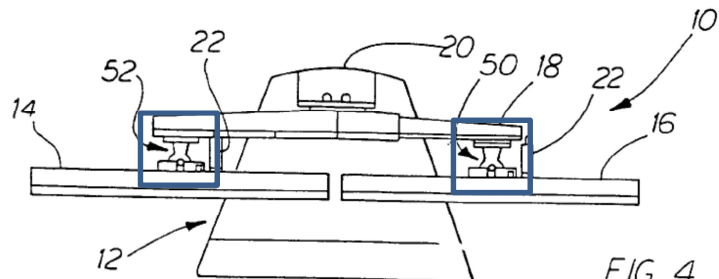
by at least one external fastening element that engages with the at least one aperture.

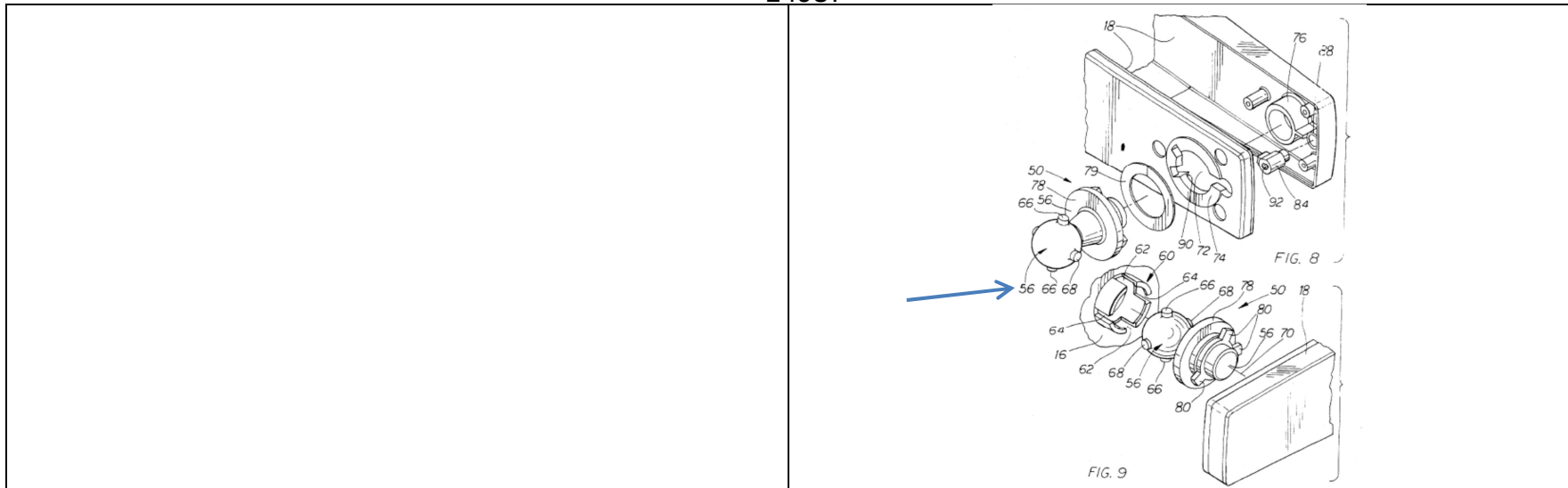
The support arm structure of the '939 patent, either taken alone or in combination with one or more secondary references as set forth

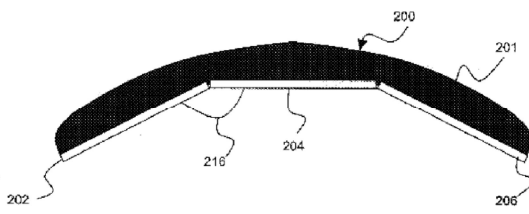
above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, the Ergotron Design Station, and the '017 patent further includes a mounting member with a hole and at least one aperture such that the support arm structure, and single piece support arm thereof, is secured to the support column through the mounting member by an acceptance of the mounting portion of the support column into the hole and by at least one external fastening element that engages with the at least one aperture. For example,

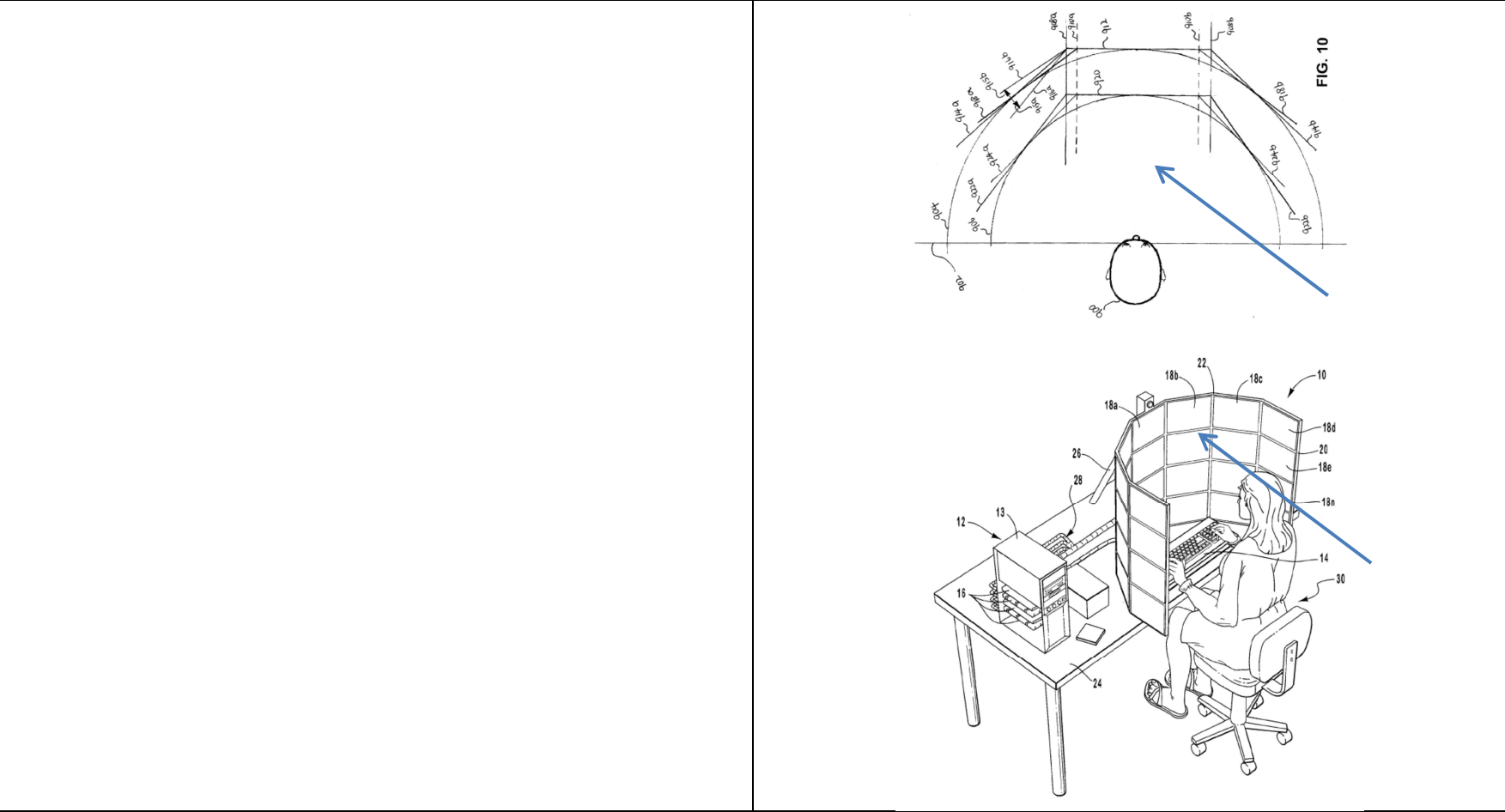


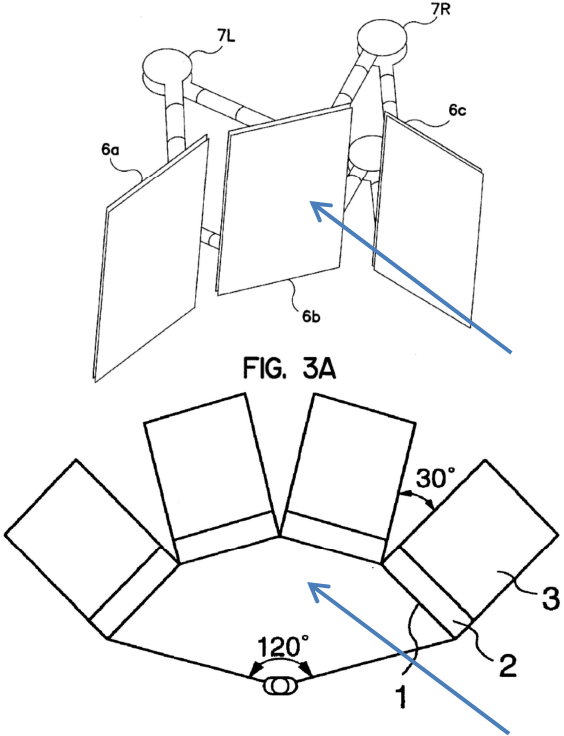
<p>The display system of claim 1, wherein the base is adapted to rest on a flat and horizontal work surface.</p>	<p>The base 12 in the '939 patent is adapted to rest on a flat and horizontal work surface.</p>  <p>FIG. 2</p>
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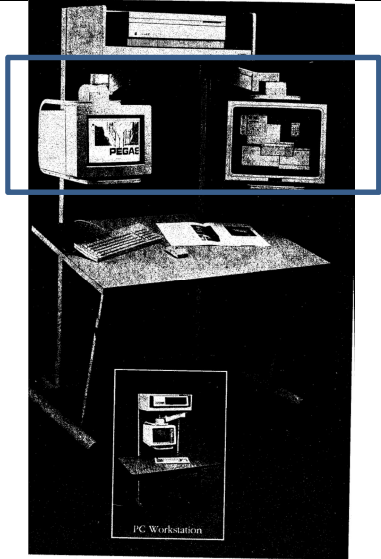
Claim 4	The '939 Patent
<p>The display system of claim 3, wherein at least two of the connectors permit two of the displays to angle independently.</p>	<p>At least two of the connectors in the '939 patent permit two of the displays to angle independently. See, for example, mounting structures 50, 52 (col. 3, ll. 54-col. 4, ll. 67; FIGS. 1-5, 9-11).</p>  <p>FIG. 4</p>



Claim 5	The '939 Patent
<p>The display system of claim 1, wherein the support arm is bowed at the front oldie arm,</p>	<p>The support arm of the '939 patent in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, and the Ergotron Design Station is bowed at the front of the arm.</p>  <p>FIG. 3B</p>



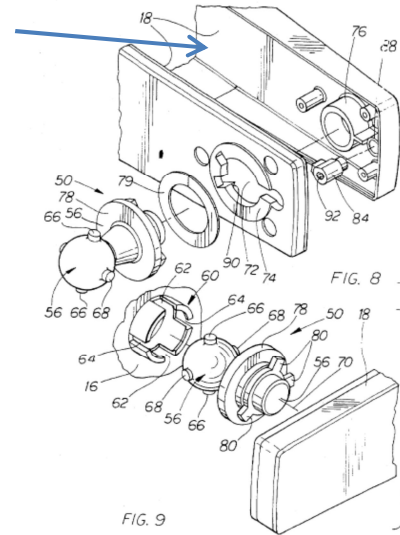


	
<p>the support arm having a radius of curvature in the range of 24-36 inches.</p>	<p>It would have been obvious for a person of ordinary skill in the art to have modified the support arm of the '939 patent in view of one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, and the Ergotron Design Station so that the support arm has a radius of curvature in the range of 24-36 inches. For example, such a modification would have been a mere design choice that would have been obvious according to known methods to yield predictable results. In particular, the display panels of the '337 patent are disclosed as being arranged between approximately 18 inches and approximately 24 inches from an eye point of a user. This range overlaps with the claimed range.</p>

Claim 6	The '939 Patent
The display system of claim 4,	
wherein the support arm includes a channel within which cables	The support arm 18 in the '939 patent includes a channel within

for the displays can be disposed.

which cables for the displays can be disposed.

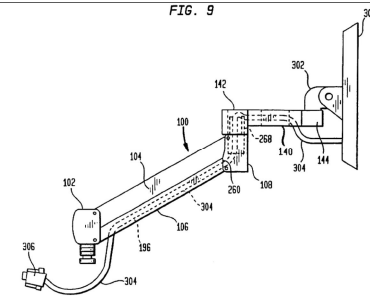


To the extent the '939 patent does not include a channel within which cables for the displays can be disposed, such a feature would have been obvious to a person of ordinary skill in the art. For example, it would have been obvious to have modified the support arm in the '939 patent to include a channel within which cables for the displays can be disposed.

Secondary References

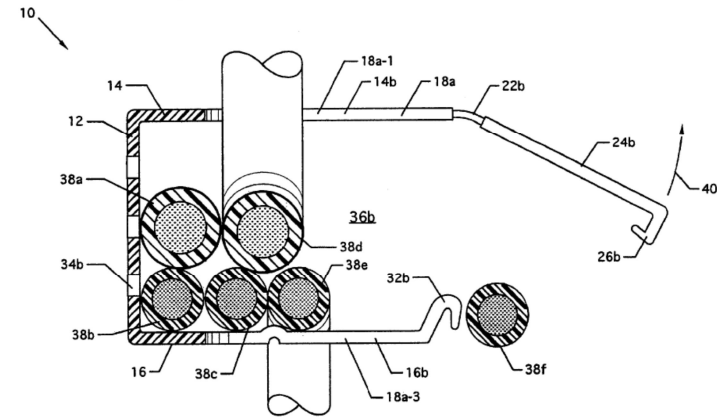
(1) The '134 patent

The '134 patent relates to an arm apparatus for mounting electronic device and includes a support arm having a channel within which cables for displays can be disposed.



(2) The '484 patent

The '484 patent describes a cable routing duct and discloses that use of a cable routing duct provides for orderly branching and routing of wires, cables and the like. The patent discloses a support arm-style structure that includes a channel within which cables can be disposed.

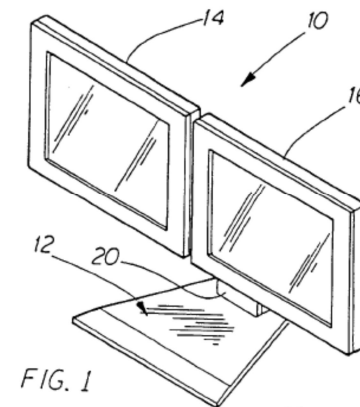


Claim 7	The '939 Patent
The display system of claim 1,	
wherein the at least two connectors includes three connectors and the at least two displays includes three displays,	It would have been obvious to a person of ordinary skill in the art to have modified the display system 10 of the '939 patent so the

	at least two connectors include three connectors and the at least two displays includes three displays. Such a modification would have been obvious as a mere duplication of parts using known techniques to yield predictable results. For example it would have been obvious to have modified the display system in the '939 patent in view of one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, and the '153 patent, which disclose display systems with three or more monitors and three or more connectors.
the display system comprising the three displays.	It would have been obvious to a person of ordinary skill in the art to have modified the display system 10 of the '939 patent so the display system comprises three displays. Such a modification would have been obvious as a mere duplication of parts using known techniques to yield predictable results. For example it would have been obvious to have modified the '939 patent in view of one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, and the '153 patent, which disclose display systems with three or more monitors.

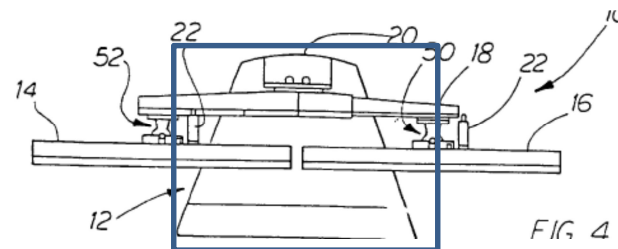
Claim 8	The '939 Patent
The display system of claim 1,	
wherein the support arm is rigid.	The support arm 18 in the '939 patent is rigid. See, for example, col. 5, ll. 1-22; FIGS. 1-4, 19.

Claim 9	The '939 Patent
A display system comprising:	The '939 patent discloses a display system 10. See, for example, FIGS. 1-6.



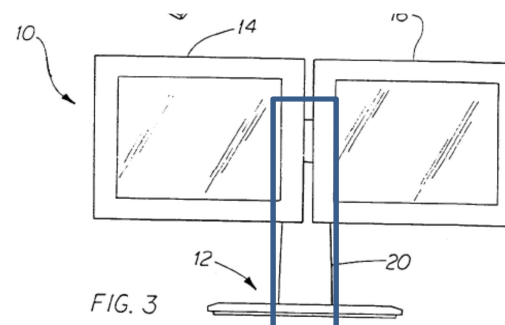
a base for resting on a surface;

The display system 10 has a base 12 for resting on a surface.



a support column attached to the base and

The display system 10 in the '939 patent has a support column connected to the base 12. See, for example, hollow upright 20.



having a mounting portion extending in a vertical direction away from the base when the surface is horizontal;

To the extent Mass's Infringement Contentions are discernible, the feature apparently alleged to be a mounting portion is a portion of a support column to which the support arm mounts. The hollow upright 20 in the '939 patent has a portion of a support column to which a support arm mounts. The mounting portion extends in a vertical direction away from the base when the surface is horizontal.

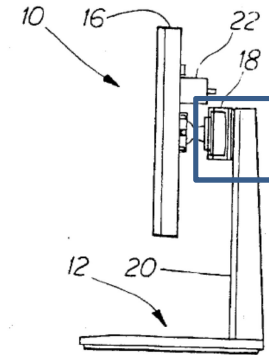


FIG. 2

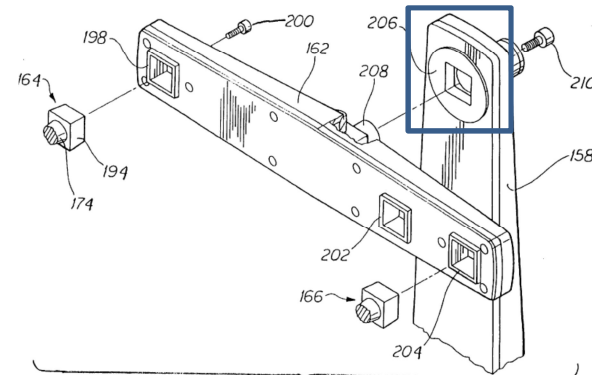


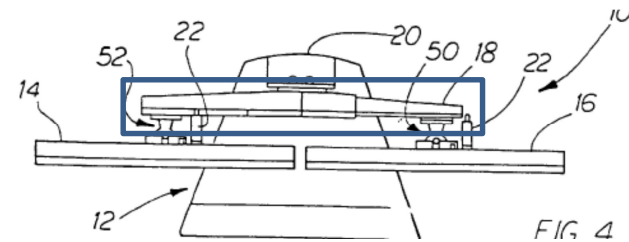
FIG. 19

a support arm structure secured to the support column, the support

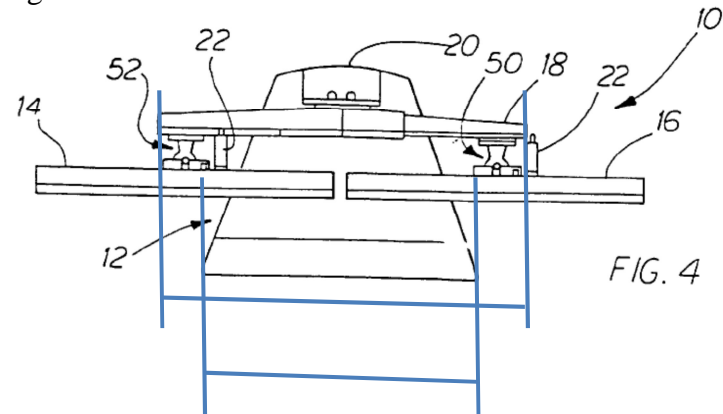
The '939 patent has a support arm structure secured to the support

arm structure having a support arm that extends on either side of the column, that is substantially horizontal when the base is resting on a horizontal surface and that has a longitudinal length that is longer than the width of the base;

column 20. The support arm structure has a support arm 18 that extends on either side of the column, that is substantially horizontal when the base is resting on a horizontal surface.

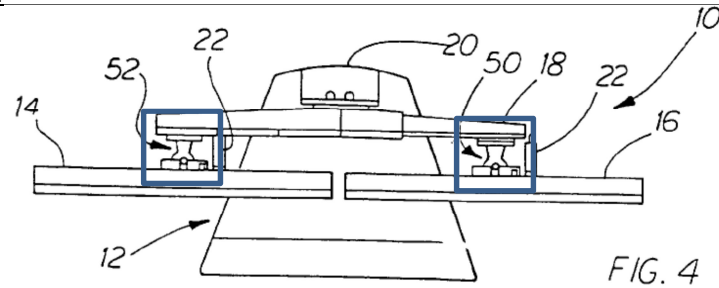


Further, the support arm 18 of the '939 patent extends on either side of the support column and that has a longitudinal length that is longer than the width of the base.



at least two connectors for connecting display housing portions at the backs of at least two displays to the support arm, such that at least a part of the support column is disposed behind the at least two displays,

The display system 10 in the '939 patent has at least two connectors for connecting display housing portions at the backs of at least two displays to the support arm 18, such that at least a part of the support column is disposed behind the at least two displays. See, for example, mounting structures 50, 52 (col. 3, ll. 54-col. 4, ll. 67; FIGS. 1-5, 9-11).



wherein: i) the front of the support arm on one side of the support column is bowed, and the front of the support arm on the other side of the support column is bowed so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays,

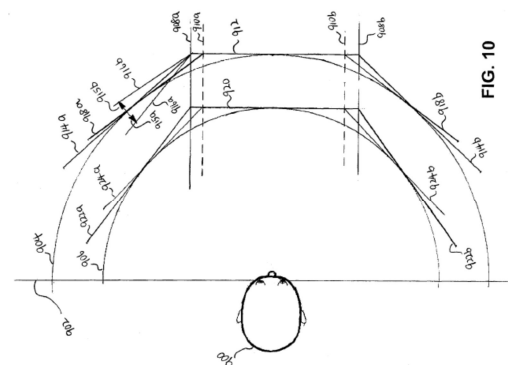
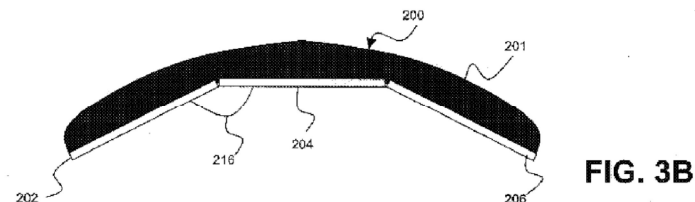
It would have been obvious to a person of ordinary skill in the art to have modified the support arm 18 in the '939 patent to configure the arm such that the front of the support arm on one side of the support column is bowed, and the front of the support arm on the other side of the support column is bowed so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays. Such a modification would have been a mere design choice that would have been obvious according to known methods to yield predictable results. For example, it would have been obvious to have modified the support arm in the '939 patent in view of one or more of the following secondary references to yield a support arm that has the front of the support arm on one side of the support column bowed, and the front of the support arm on the other side of the support column bowed so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays,

Secondary References

(1) The '337 patent

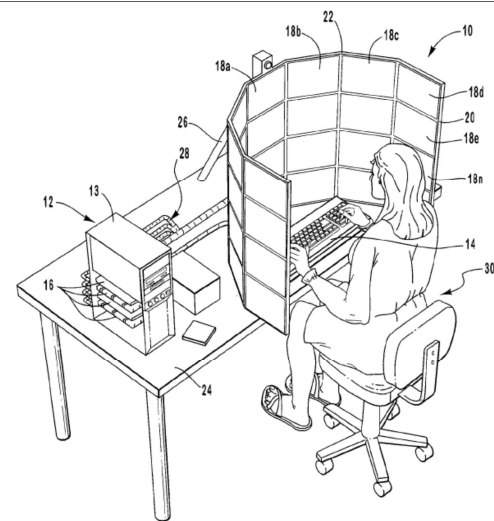
The '337 patent relates to a multi-panel video display system having a plurality of displays that are arranged so the display panels are substantially equidistant from an eye point of a user.

The patent discloses a display arrangement that is bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays. For example, the display panels are disclosed as being arranged between approximately 18 inches and approximately 24 inches from an eye point of a user. (column 2, lines 30-60).



(2) The '328 publication

The '328 publication describes a multi-screen display system that includes a plurality of display screens that are concave in shape about a user. (Abstract). The publication discloses a display arrangement that is bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays.



(3) The '890 patent

The '890 patent discloses a two-dimensional image display device that includes a curved display system wrapping about a user. The patent discloses that the display system is bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays.

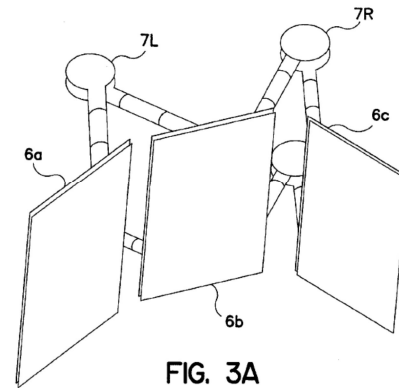
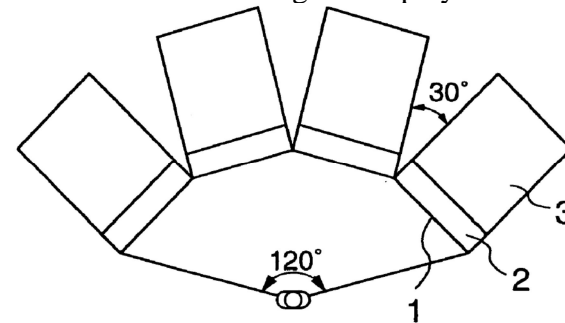
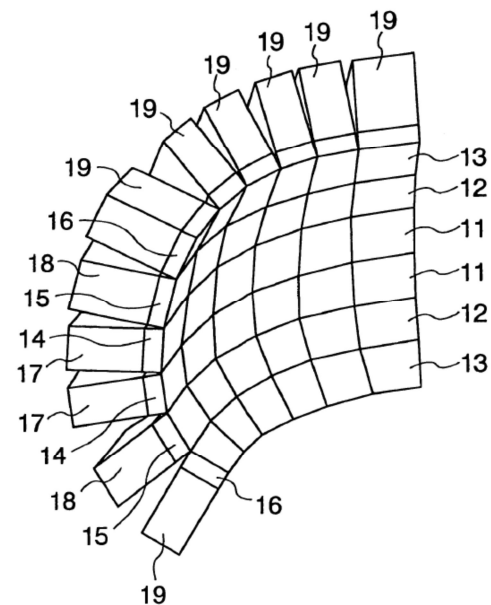


FIG. 3A

(4) The '153 patent

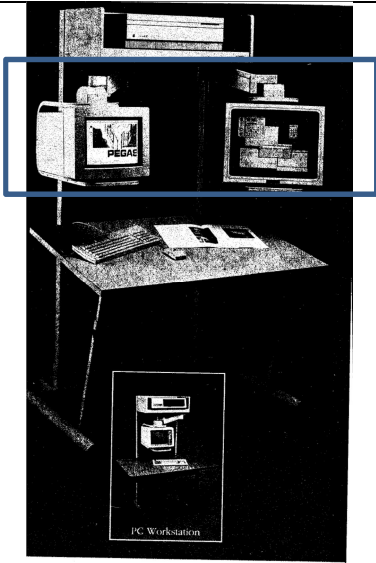
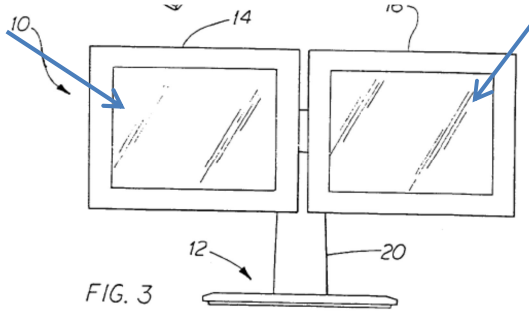
The '153 patent discloses a multi-display apparatus that arranges display devices across a concave surface both in a horizontal visibility angle direction and a vertical visibility angle direction. The patent discloses that the display devices are bowed at the front so that in use the displays tend to wrap around a user positioned in front of and viewing the displays.





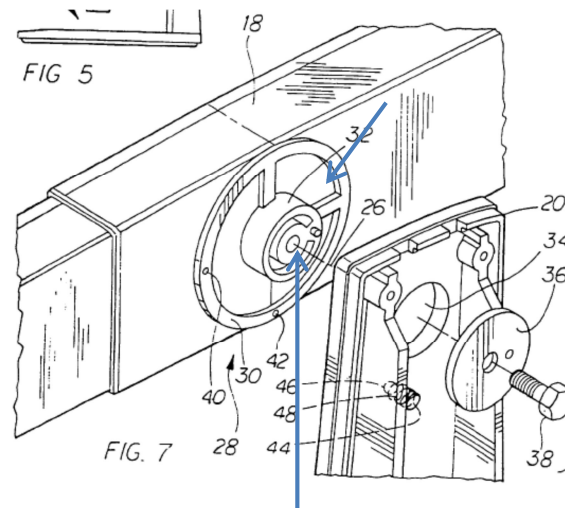
(5) The Ergotron Design Station

The Ergotron Design Station discloses a display system that has a support arm assembly that is bowed at the front of the support arm assembly so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays.

	
<p>and ii) the support arm is adapted to support most of the weight of the at least two displays when the display housing portions at the backs of the at least two displays are connected to the support arm,</p>	<p>The support arm 18 in the '939 patent, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, and the Ergotron Design Station, is adapted to support most of the weight of the at least two displays when the display housing portions at the backs of the at least two displays are connected to the support arm.</p> 
<p>the support arm structure further comprising a mounting member</p>	<p>The support arm structure of the '939 patent further includes a</p>

with a hole and at least one aperture,

mounting member with a hole and at least one aperture.

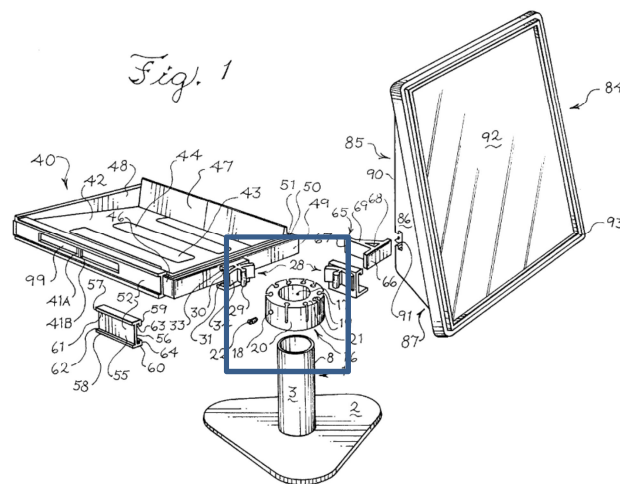


In addition, to the extent Mass's Infringement Contentions are discernible, the feature apparently alleged to be a mounting member with a hole and at least one aperture is a clamp that goes over a pole and has an opening for a tightening screw. To the extent the display system 10 of the '939 patent does not have a support arm structure that includes a mounting member with a hole and at least one aperture, such a feature would have been obvious to a person of ordinary skill in the art. For example, it would have been obvious to have modified the display system 10 of the '939 patent, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, the Ergotron Design Station to include a clamp that goes over a pole (*upright* 20) and an opening for a tightening screw.

Secondary Reference

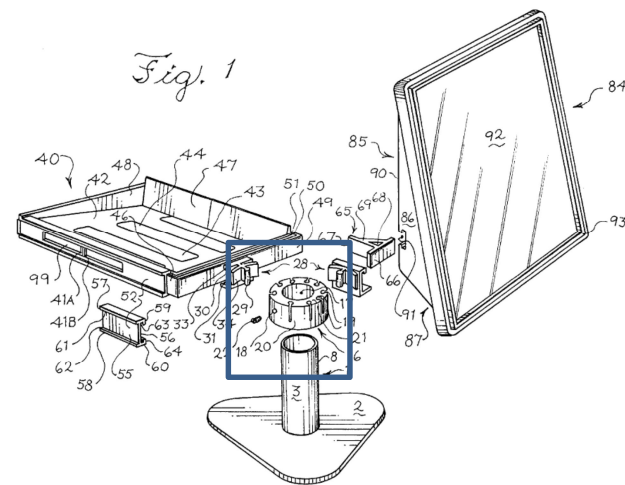
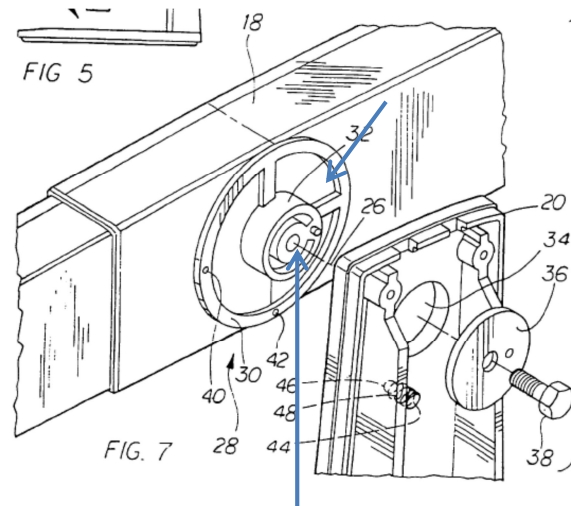
The '017 patent

The '017 patent describes a display system having a foundational unit. With respect to FIG. 1, the reference describes the foundational unit 1 comprised of a base 2 and column 3. A supporting collar 16 can slip over the column 3 and is mounted to the column by means of a screw.



such that the support arm is secured to the support column through the mounting member by an acceptance of the mounting portion of the support column into the hole and

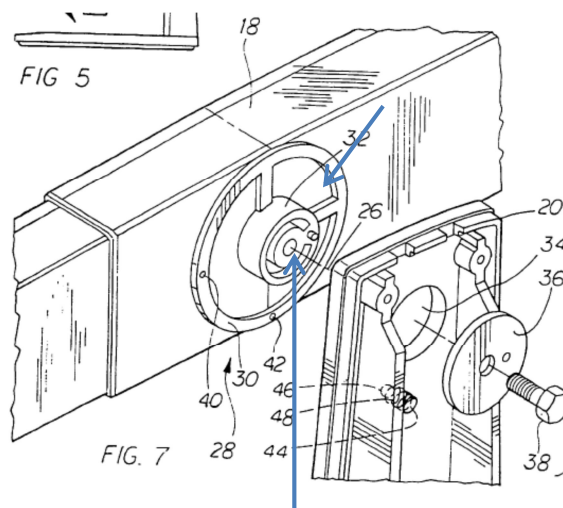
The support arm structure of the '939 patent, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, the Ergotron Design Station, and the '017 patent further includes a mounting member with a hole and at least one aperture such that the support arm structure is secured to the support column through the mounting member by an acceptance of the mounting portion of the support column into the hole. For example,

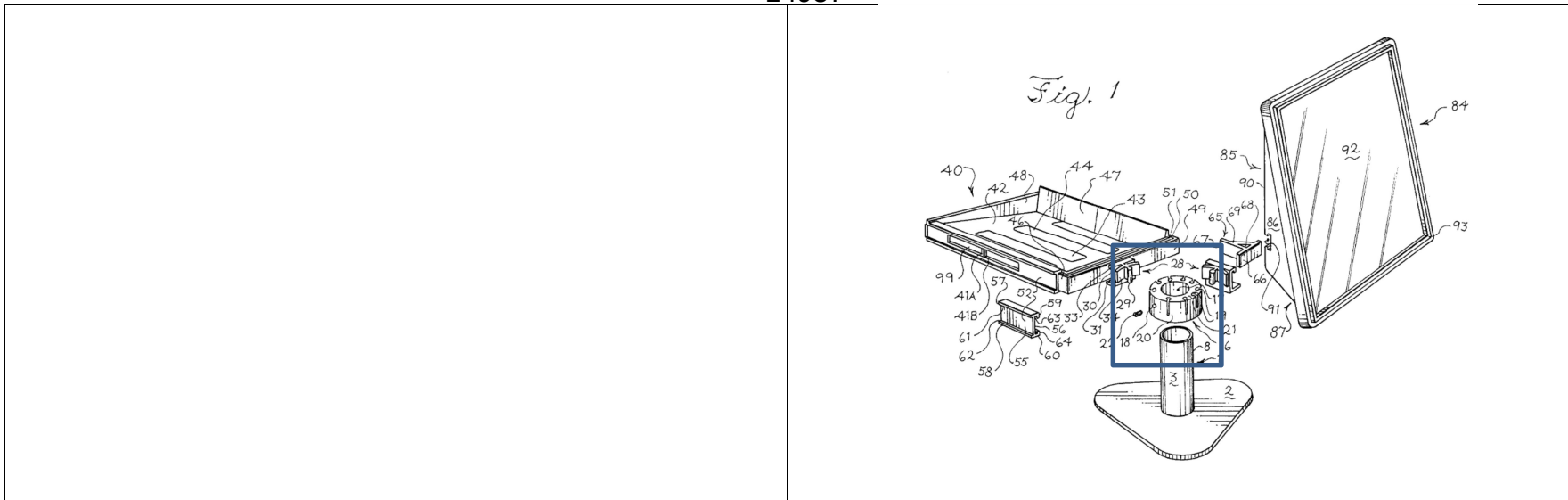


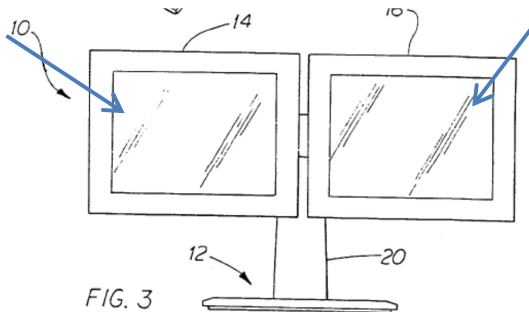
by at least one external fastening element that engages with the at least one aperture.

The support arm structure of the '939 patent, either taken alone or in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890

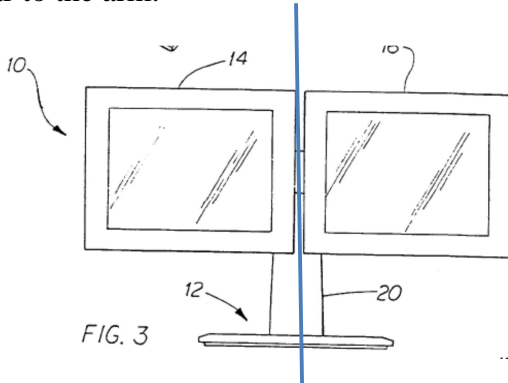
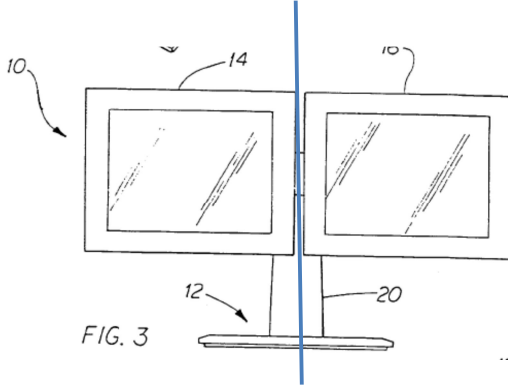
patent, the '153 patent, the Ergotron Design Station, and the '017 patent further includes a mounting member with a hole and at least one aperture such that the support arm structure is secured to the support column through the mounting member by an acceptance of the mounting portion of the support column into the hole and by at least one external fastening element that engages with the at least one aperture. For example,





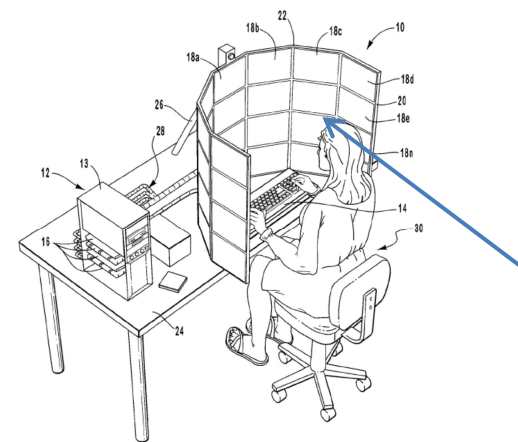
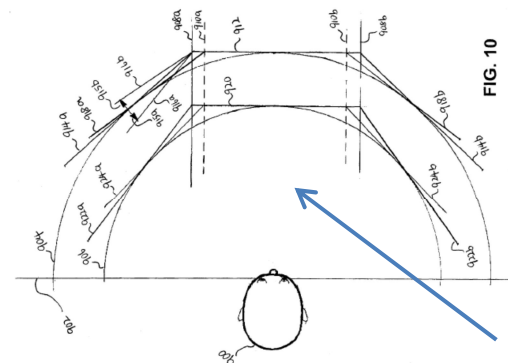
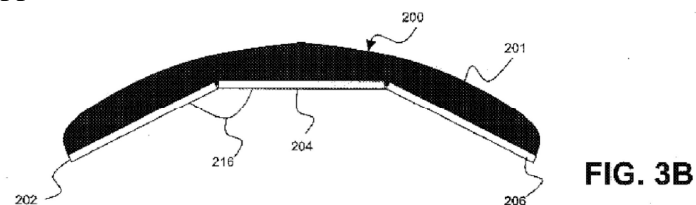
Claim 10	The '939 Patent
<p>The display system of claim 9, wherein the support arm supports all of the weight of the displays when the displays are connected to the support arm.</p>	<p>The support arm 18 in the '939 patent is adapted to support all of the weight of the displays when the displays are connected to the support arm.</p>  <p>FIG. 3</p>

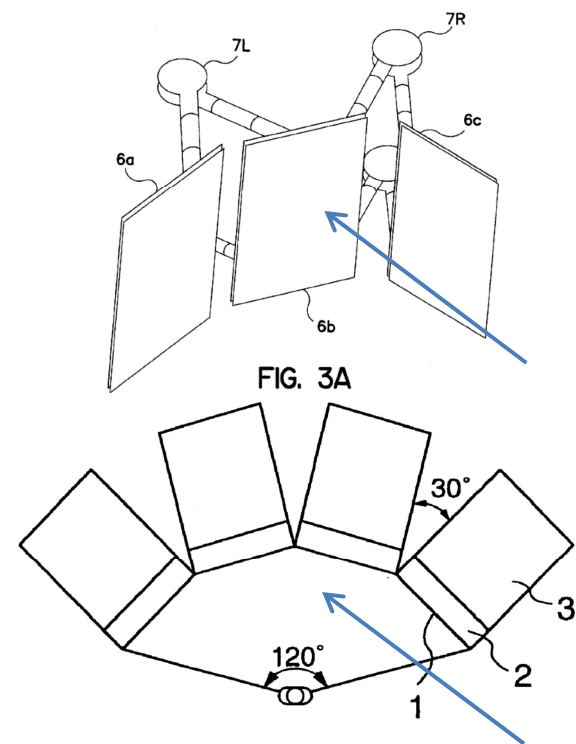
Claim 11	The '939 Patent
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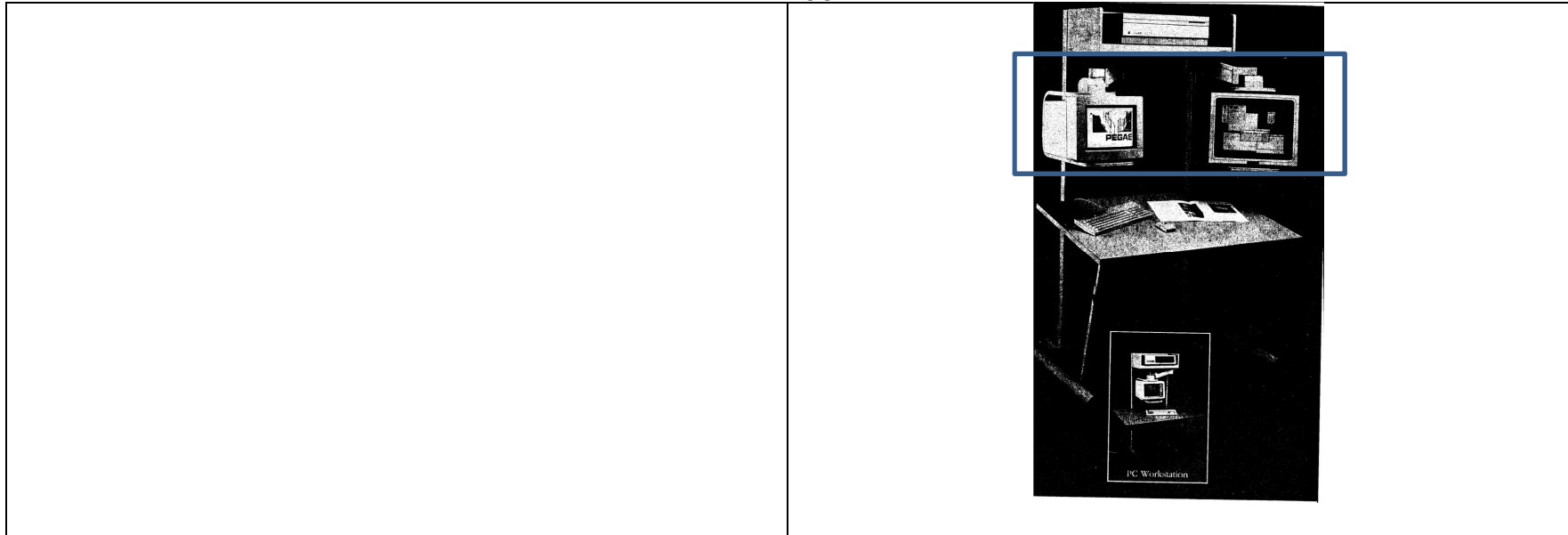
<p>The display system of claim 10, wherein the support arm has a plane asymmetry perpendicular to the arm,</p>	<p>The support arm 18 of the '939 patent has a plane of symmetry perpendicular to the arm.</p>  <p>FIG. 3</p>
<p>said plane being vertical when the base is resting on a horizontal surface.</p>	<p>The plane of symmetry in the '939 patent is vertical when the base is resting on a horizontal surface.</p>  <p>FIG. 3</p>

Claim 12	The '939 Patent
<p>The display system of claim 10, wherein the bowed part of the support arm describes a smooth curve.</p>	<p>The support arm 18 of the '939 patent in combination with one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent, and</p>

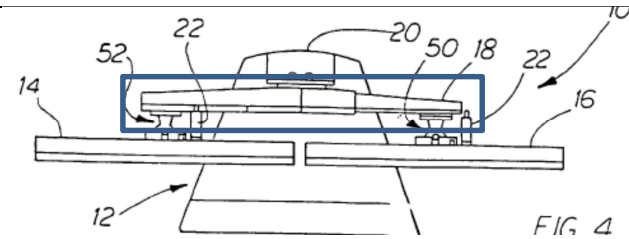
the Ergotron Design Station is configured so the bowed part of the support arm describes a smooth curve.



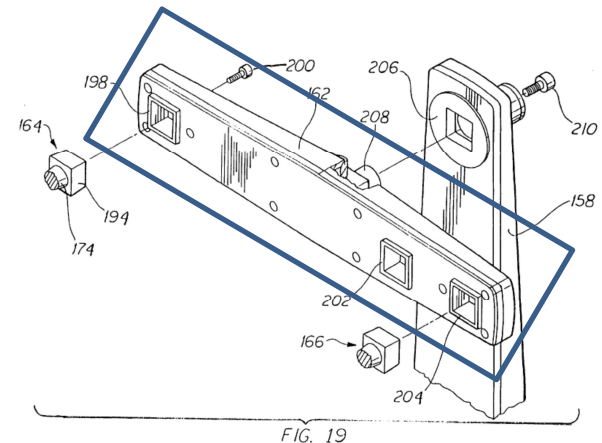




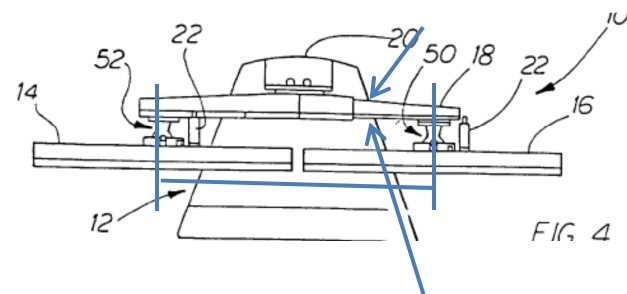
Claim 14	The '939 Patent
<p>The system of claim 9, wherein the support arm is formed as a single piece component.</p>	<p>To the extent Mass's Infringement Contentions are discernible, the feature apparently alleged to be a support arm formed as a single piece component is a multi-piece arm having an extension (hinges) connecting the different pieces of the support arm. The support arm 18 of the '939 patent has a multi-piece arm having an extension connecting the different pieces of the support arm. Thus, the support arm 18 in the '939 patent is formed as a single piece component under Mass's construction.</p>



To the extent the support arm 18 of the '939 patent is not formed as a single piece component, such a feature would have been obvious to a person of ordinary skill as merely making integral what was previously separate pieces. For example, it would have been obvious to the person of ordinary skill in the art to form the support arm 18 of the '939 patent as a single piece component in view of support arm 162 also disclosed in the '939 patent, which is formed as a single piece component. See, for example, col. 6, ll. 52-64.



Claim 16	The '939 Patent
The system of claim 1,	
wherein the thickness of the support arm is less than the distance between adjacent connectors.	The thickness of the support arm in the '939 patent is less than the distance between adjacent connectors.

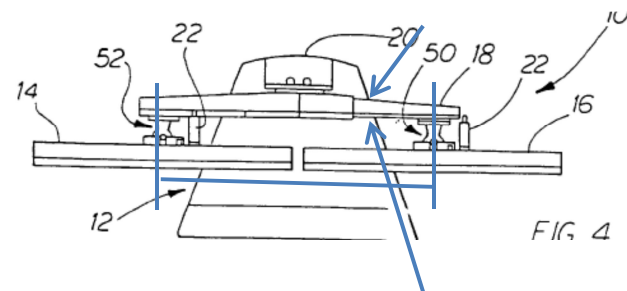


Claim 17

The system of claim 9,
wherein the thickness of the support arm is less than the distance
between adjacent connectors.

The '939 Patent

The thickness of the support arm in the '939 patent is less than the
distance between adjacent connectors.



Claim 18

The system of claim 9,
wherein the front of the support arm on one side of the support
column has a radius of curvature in the range of 24-36 inches,

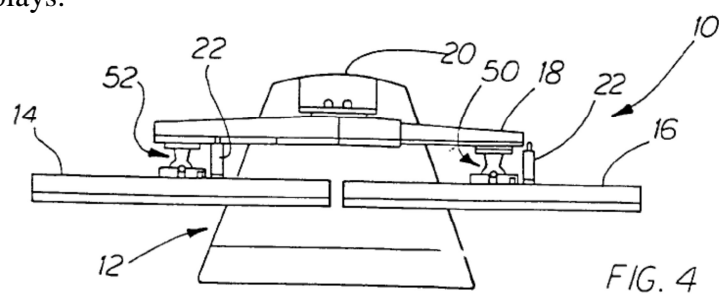
The '939 Patent

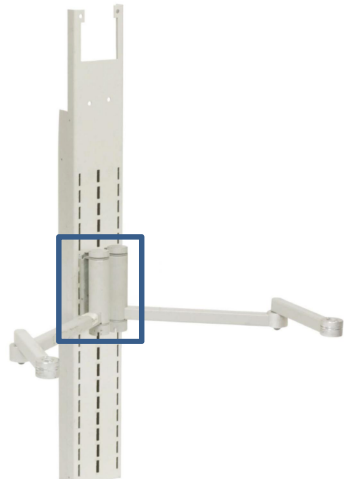
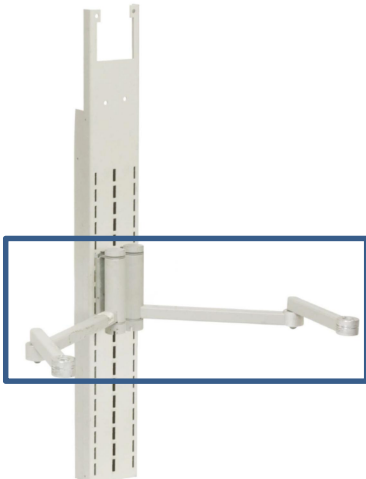
It would have been obvious to modified the support arm 18 in the
'939 patent in view of one or more of one or more secondary
references as set forth above, such as the '337 patent, the '328
publication, the '890 patent, the '153 patent and the Ergotron
Design Station to configure the front of the support arm on one
side of the support column to have a radius of curvature in the
range of 24-36 inches. Such a modification would have been a

	mere design choice that would have been obvious according to known methods to yield predictable results. As one particular example, the display panels of the '337 patent are disclosed as being arranged between approximately 18 inches and approximately 24 inches from an eye point of a user. This range overlaps with the claimed range.
and the front of the support arm of the other side of the support column has a radius of curvature in the range of 24-36 inches.	It would have been obvious to modified the support arm 18 in the '939 patent in view of one or more of one or more secondary references as set forth above, such as the '337 patent, the '328 publication, the '890 patent, the '153 patent and the Ergotron Design Station to configure the front of the support arm on the other side of the support column to have a radius of curvature in the range of 24-36 inches. Such a modification would have been a mere design choice that would have been obvious according to known methods to yield predictable results. As one particular example, the display panels of the '337 patent are disclosed as being arranged between approximately 18 inches and approximately 24 inches from an eye point of a user. This range overlaps with the claimed range.

IV. The NYSE Trading Floor Display System

Claim 1	The NYSE Trading Floor Display System (hereinafter “the NYSE System”) Refer to the annotated copy included as Exhibit I.
A display system comprising:	The NYSE System provides a display system 100.
a base;	Depending on the Court’s claim construction, the NYSE System

	<p>provides a base 110. Regardless, configuring the NYSE System with a different type of base would have been obvious to a person of ordinary skill in the art as simple substitution of one known element for another known element to yield predictable results.</p> <p><u>Secondary Reference</u></p> <p>The '939 patent</p> <p>The '939 patent discloses a display system having a base 12, a pair of electronic displays, and an arm assembly that supports the displays.</p> 
<p>a support column connected to the base and having a mounting portion extending in a vertical direction away from the base when the base is disposed on a horizontal surface;</p>	<p>The NYSE System, either alone or in combination with a secondary reference, such as the '939 patent, has a support column 120 connected to the base 110.</p> <p>To the extent Mass's Infringement Contentions are discernible, the feature apparently alleged to be a mounting portion is a portion of a support column to which the support arm mounts. The support column 120 in the NYSE System has a portion to which a support arm mounts. The mounting portion extends in a vertical direction away from the base when the base is disposed on a horizontal surface.</p>

	
<p>a support arm structure secured to the support column, the support arm structure having a single piece support arm that extends on either side of the support column and that has a longitudinal length that is longer than the width of the base; and</p>	<p>The NYSE System has a support arm structure secured to the support column.</p>  <p>To the extent Mass's Infringement Contentions are discernible, the feature apparently alleged to be a single piece support arm</p>

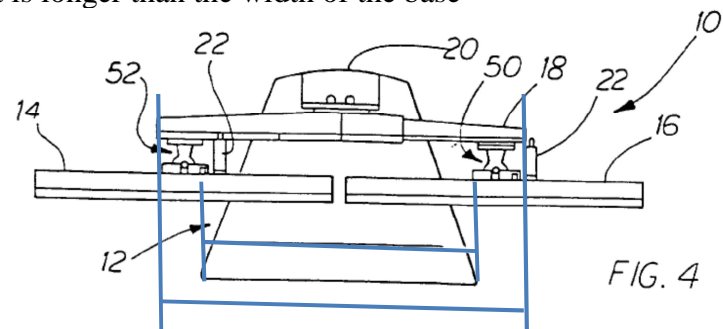
that extends on either side of the support column is a multi-piece arm having joints (e.g., hinges) connecting the different pieces of the support arm. The arms of the NYSE System extend on either side of the support column and are connected by joints (e.g., hinges). In addition, to the extent the arms of the NYSE System are not a single piece support arm, such a feature would have been obvious to a person of ordinary skill as merely making integral what were previously separate pieces.

It would have been obvious for a person of ordinary skill in the art to have resized the arms and/or the base of the NYSE System so the arm has a longitudinal length that is longer than the width of the base. Such a modification would have been a simple change of dimensions without changing functionality.

Secondary Reference

The '939 patent

The '939 patent discloses a display system having a base, a pair of electronic displays, and an arm assembly that supports the displays. The arm assembly includes an arm that extends on either side of a support column and that has a longitudinal length that is longer than the width of the base



at least two connectors for connecting display housing portions at the backs of at least two displays to the support arm, such that at least a part of the support column is disposed behind the at least two displays,

The NYSE System has at least two connectors for connecting display housing portions at the backs of at least two displays to the support arm, such that at least a part of the support column is disposed behind the at least two displays. See, for example, displays 130 in Exhibit.



To the extent the NYSE System does not have at least two connectors for connecting display housing portions at the backs of at least two displays to the support arm, such a feature would have been obvious to a person of ordinary skill in the art. For example, it would have been obvious to have modified the arm attachments of the NYSE System to include such a feature as a matter of simple substitution of one known element for another known element to yield predictable results.

Secondary Reference

The '672 patent

The '672 patent describes a mounting system for a flat panel

display. The disclosed system provides a multi-jointed and pivoted support system for a flat panel video display. See, for example, three axis pivot 30 (FIGS. 1-6, 22, and 27-29).

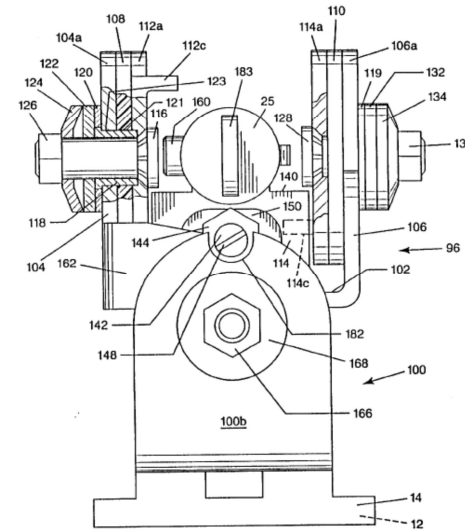


FIG. 6

wherein: the support arm is a) bowed at the front of the support arm so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays,

The arms of the NYSE System are bowed at the front of the support arm so that in use the support arm tends to wrap around a user positioned in front of and viewing the displays.